## IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)

In Re:

SIMONA S. ROBINSON AKA : Bankruptcy No. 22-13307-mdc

SIMONA S. JOHNSON-ROBINSON,

Debtor : Chapter 13

The Bank of New York Mellon f/k/a The Bank of New

York as successor in interest to JPMorgan Chase Bank, National Association, as Trustee for GSRPM Mortgage Pass-Through Certificates, Series 2003-1

Movant :

v. :

SIMONA S. ROBINSON AKA : 11 U.S.C. §362 and §1301

SIMONA S. JOHNSON-ROBINSON

And

DOUGLAS M. ROBINSON (NON-FILING CO-

**DEBTOR**)

and

KENNETH E. WEST, ESQUIRE (TRUSTEE)

Respondent(s)

# CERTIFICATION OF NO ANSWER REGARDING THE BANK OF NEW YORK MELLON F/K/A THE BANK OF NEW YORK AS SUCCESSOR IN INTEREST TO JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR GSRPM MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2003-1'S MOTION FOR RELIEF FROM STAY (DE 43)

The undersigned hereby certifies that, as of <u>January 2, 2024</u>, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay. Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before <u>December 15, 2023</u>.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: January 3, 2024 Respectfully submitted,

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439 Matthew Fissel, PA Bar No. 314567 Mario Hanyon, PA Bar No. 203993 Ryan Starks, PA Bar No. 330002 Jay Jones, PA Bar No. 86657 Attorney for Creditor BROCK & SCOTT, PLLC 3825 Forrestgate Drive Winston Salem, NC 27103

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Movant

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SIMONA S. ROBINSON AKA : 11 U.S.C. §362 §1301

SIMONA S. JOHNSON-ROBINSON

and

DOUGLAS M. ROBINSON (NON-FILING CO-

**DEBTOR**)

and

**KENNETH E. WEST, ESQUIRE (TRUSTEE)** 

Respondent(s) :

#### **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of No Answer has been electronically served or mailed, postage prepaid on January 3, 2024 to the following:

SIMONA S. ROBINSON 3029 S 70TH ST PHILADELPHIA, PA 19142-2531

SIMONA S. ROBINSON MAILING ADDRESS P.O. BOX 33167 PHILADELPHIA, PA 19142-0167

DOUGLAS ROBINSON 3029 S 70TH ST PHILADELPHIA, PA 19142-2531

MICHAEL I. ASSAD, Debtor's Attorney 1500 Walnut St Ste 900 Philadelphia, PA 19102 mail@cibiklaw.com Case 22-13307-mdc Doc 45 Filed 01/03/24 Entered 01/03/24 17:15:38 Desc Main Document Page 4 of 4

KENNETH E. WEST, Bankruptcy Trustee 1234 Market Street - Suite 1813 Philadelphia, PA 19107

Office of United States Trustee, US Trustee Robert N.C. Nix Federal Building 900 Market Street, Suite 320 Philadelphia, PA 19107

#### /s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439 Matthew Fissel, PA Bar No. 314567 Mario Hanyon, PA Bar No. 203993 Ryan Starks, PA Bar No. 330002 Jay Jones, PA Bar No. 86657 Attorney for Creditor BROCK & SCOTT, PLLC 3825 Forrestgate Drive Winston Salem, NC 27103 Telephone: (844) 856-6646

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